

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

INFORMATION ASSOCIATED  
WITH FACEBOOK ACCOUNT  
WITH USER 10100008562011804 IN  
POSSESSION OF FACEBOOK,  
INC.

Case No. 1:19MJ221

MOTION TO SEAL BY REDACTION

NOW COMES the United States of America, by Sandra J. Hairston, Acting United States Attorney for the Middle District of North Carolina, through her assistant, Eric L. Iverson, and respectfully moves this Honorable Court, to seal the above-referenced search warrant application by redaction. Such sealing is within the inherent power of the court to control papers filed with it, *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989).

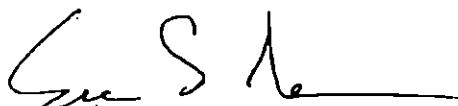
In this case, such an order would be appropriate because the warrant application relates to an ongoing criminal investigation and its disclosure may alert the targets that they are under investigation. Law enforcement is investigating a family of malicious software that targeted critical industries worldwide resulting in significant monetary losses. The perpetrators are known to use sophisticated methods to conceal their identity and criminal activity. Further, they are believed to reside outside of the United States. Accordingly, there is reason to believe that the full disclosure of the warrant

application will seriously jeopardize the investigation or unduly delay a trial, including by giving targets an opportunity to avoid prosecution, destroy or tamper with evidence, or change patterns of behavior. Much of the evidence in this investigation is stored electronically. If alerted to the warrant documents in their entirety, the subjects under investigation could destroy that evidence, including information saved to their personal computers.

WHEREFORE, the government respectfully moves that this Honorable Court seal the above-referenced warrant application by redaction.

Respectfully submitted this 22nd day of December, 2021.

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